

## **Appendix For Plaintiff's Rule 54(b) Motion**

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# Exhibit 1- 03-26-2024 Letter from Third Circuit Court of Appeals

## OFFICE OF THE CLERK

PATRICIA S. DODSZUWEIT

CLERK



## UNITED STATES COURT OF APPEALS

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TELEPHONE

215-597-2995

March 26, 2024

Assata Acey Hackman  
5121 Brown Street  
Philadelphia, PA 19139

RE: Assata Hackman v. Inductev  
Case Number: 24-1521  
District Court Case Number: 2-23-cv-01438

Dear Assata Acey Hackman:

This will advise you that the above-captioned appeal will be submitted to a panel of this Court for possible dismissal due to a jurisdictional defect. It appears that this Court may lack appellate jurisdiction for the following reason(s):

The order that you have appealed is not reviewable at this time by a Court of Appeals. An order entered by a District Court that decides fewer than all of the claims, or determines the rights and liabilities of fewer than all of the parties, is not immediately appealable **unless** the District Court directs the entry of a final judgment as to the claim(s) or party(ies) under Federal Rule of Civil Procedure 54(b) (enclosed).

Jurisdictional defects cannot be remedied by the court of appeals. The parties may submit written argument in support of or in opposition to dismissal of the appeal for lack of appellate jurisdiction. Any response regarding jurisdiction must be in proper form (original with certificate of service), and must be filed within 21 days from the date of this letter. Upon expiration of the response period, the case will be submitted to the Court for consideration of the jurisdictional question.

The parties will be advised of any Order issued in this matter.

Very truly yours,

Excerpt- Lines 39-41 of My Complaint



32. Before the end of 2021, it became clear that the nature of my job duties was objectively more advanced than the formal designation of my role.
33. After tasks of organizing meetings to formalize the relationship between Quality and Mechanical departments, providing theoretical chemical consultation to maximize product use, and drafting circuitry for an upcoming high stakes project, it became clear that my task types were not aligned with my job classification- and as the one of the lower-ranking members of my team, I felt that this was due to race and gender.
34. I made sure to document these contributions in my performance review while hinting my desire to be properly compensated for future advanced duties.
35. I also took the time to communicate the concerns of being misclassified to my supervisor- even going so far as to send potential job titles and descriptions in line with current duties.
36. Despite this I continued to find myself completing advanced tasks such as, providing ANSI compliant calculations, documentation, and PPE procurement for laser usage—all without any change in role.
37. This continued until my leave of absence.
38. Between January and April of 2022, lack of cooperation from colleagues who had criticized me grew to be so great that my supervisor had to have me submit emails to him so that he could forward them to others with his stamp of approval—instead of the teamwide procedure of emailing others directly and cc-ing him as needed.
39. On February 7, 2022, in a meeting held by CAO to explain why we couldn't share my curated movie list for Black History Month-- I discussed recent experiences and why I saw the need for an ongoing diversity initiative.

40. These experiences included:
- a) Witnessing a White employee complaining to two other non-Black employees, that Julian needed to “get off his lazy ass” to close a garage door sooner.
  - b) An event where one of those same witnessing employees had unrelentingly questioned me to regarding my job tasks and how I was “spending my time” while supporting a project at a location where they had been unable to surveil me.
  - c) Various acts of hostility towards me by a White team member including:
    - i) Snatching my notes from my hands to prevent me from describing our joint project to supervising engineer.
    - ii) Slamming a door in my face, after holding open the door for a White woman
    - iii) Criticizing me in our shared team group chat with disproportionate and inappropriate fierceness.
41. Immediately following our meeting, I summarized its content to my supervisor in a Teams message.
42. In the days following, HR chose to call me again to confirm details, before emailing that I had not reported any events and was invited to recount details in writing along with suggestions for the annual diversity training.
43. Upon hearing I was working from home with nausea during one of the confirmation calls, CAO asked if I was pregnant and doubled down in suggesting that I see her daughter’s gynecologist.
44. Around April 18, 2022, I experienced an onset of symptoms that would later become a chronic condition.

Excerpt- Lines 96, 98-99 of My Complaint

recklessly discarded by the refusal proactively assess and regulate the understanding of employees, even when concerning ideas had been brought in training.

93. Before my 02/14/2022 meeting, I had described my experiences with racial bias with CAO on two occasions:
  - a) I had described previous racial experiences during new employee orientation, to help colleagues around a compliance concept.
  - b) I had described concerns brought to me in an offsite lunch with colleagues-where they raised questions around what constituted racial bias.
94. On both occasions there was no acknowledgement for the need for more company-led education; I was instead encouraged that contributions that I could give to employee understanding were welcome-on a volunteer basis.
95. Because I had been explicitly informed by CAO that any input that I volunteered towards employee education would be welcome, I set aside my time over the weekend to detail a voluntary diversity exercise for staff and presented it to CAO via email, and with reference to perceived business advantages and it being Black History Month.
96. On 02/07/2022, I relayed specific instances of racial harassment detailed instances of harassment I experienced from coworkers and why I felt the current diversity training was not effective. This was in the same 73-minute meeting CAO had initiated to inform me that neither my emailed activity nor any mention of Black History Month would be communicated on the company list serv.
97. On 02/11/2022 CAO called me, for 16 minutes, to “clarify details” of recounted experiences.

98. On 02/14/2022, I received an email claiming that I had not provided specific instances and requesting “brief notes” for use in training. This claim directly contradicted the duration and content of my meetings with CAO and enhanced then chronic, symptoms of anxiety and demoralization.
99. The person emailing had to be aware of the contradiction because they had been present for our meetings, knew first-hand the number of examples I had given, and had acknowledged the degree of detail through their reasoning for follow up in paragraph 97.
100. There would be no logical purpose to knowingly present false information except to convey to me that they were purposefully ignoring my allegations.
101. Such a conveyance was successful in making me feel like my suggestions, motivating complaints, and the trauma and trepidation involved in recounting them were being cast aside on purpose.
102. I aver the communication of paragraph 98 was sent with the intent and effect of intimidating me for opposing racial discrimination, and aiding administration in maintaining false images of both taking racial discrimination seriously and welcoming employee feedback.
103. By diligently and purposefully intimidating me in discrimination to my having opposed racial harassment, Defendant intentionally violated 42 U.S.C. §2000e-3(a); therefore, I demand judgment in my favor and against the defendant, in an undetermined award amount together with all applicable affirmative action, compensatory and punitive damages as granted under 42 U.S.C §2000e-7, and 42 U.S.C. §1981a(a)(1), as well as any other relief designated by the court.

# ECF 15-50- 02/14/2022 HR Denial of Direct Complaints



Assata Acey &lt;aceyassata@gmail.com&gt;

---

**Fwd: Per our Discussion**

**Assata Acey** <Assata.Acey@momentumdynamics.com>  
To: Assata Acey <aceyassata@gmail.com>

29 April 2022 at 10:37

**Assata Acey | Technician****484-320-8222 ext 178****Momentum®**  
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---

**From:** Judy Talis <[judy.talis@momentumdynamics.com](mailto:judy.talis@momentumdynamics.com)>  
**Sent:** Monday, February 14, 2022, 10:45 AM  
**To:** Assata Acey <[Assata.Acey@momentumdynamics.com](mailto:Assata.Acey@momentumdynamics.com)>  
**Subject:** Per our Discussion

Assata:

Thanks again for spending time with me last week to share your concerns. In follow-up, you raised a general concern surrounding behavior that you believe constitutes unconscious bias. During our meetings, I asked if there were specific individuals or incidents about which you were making a complaint and/or needed to be addressed and you responded no, but added that there were interactions that you have had with other employees that you believe might be useful to incorporate into future company training.

In response, I would like to invite you to send me some brief notes concerning these examples and I will certainly review them for inclusion into our upcoming workplace training. You may send those to me at your convenience and I will let you know if I have any questions or need additional discussion with you.

Thank you for sharing your thoughts and input. Additionally, if you at any time believe that there are matters which you believe violate our policies against harassment or discrimination, please let me know immediately.

Regards,  
Judy

**Judith Talis | Chief Administrative Officer**  
Momentum Dynamics Corporation  
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Exhibit 2- 02-2-23-2022 Present Sense

Impression PM 12-02-38 INDUCTEV

INITDISCL009825

Message

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**From:** Assata Acey [Assata.Acey@momentumdynamics.com]  
**Sent:** 2/23/2022 12:02:38 PM  
**To:** Joren Wendschuh [joren.wendschuh@momentumdynamics.com]

Judy looked me in eye and asked if I'd dine anything fun over weekend

Exhibit 3- 02-23-2022 Present Sense Impression

PM 12-02-50 INDUCTEV INITDISCL012160

Message

---

**From:** Assata Acey [Assata.Acey@momentumdynamics.com]  
**Sent:** 2/23/2022 12:02:50 PM  
**To:** Joren Wendschuh [joren.wendschuh@momentumdynamics.com]

Meh hut also confirmed diversity training is in summerb

Exhibit 4- 02-23-2022 Present Sense Impression

PM 12-03-12 INDUCTEV INITDISCL004730

Message

---

**From:** Joren Wendschuh [joren.wendschuh@momentumdynamics.com]  
**Sent:** 2/23/2022 12:03:12 PM  
**To:** Assata Acey [Assata.Acey@momentumdynamics.com]

Sounds good.

Exhibit 5- 02-23-2022 Present Sense Impression

PM 12-03-56 INDUCTEV INITDISCL011803

Message

---

**From:** Joren Wendschuh [joren.wendschuh@momentumdynamics.com]  
**Sent:** 2/23/2022 12:03:56 PM  
**To:** Assata Acey [Assata.Acey@momentumdynamics.com]; Christopher Schatz [chris.schatz@momentumdynamics.com]; Ryan Taggart [Ryan.Taggart@momentumdynamics.com]; Brian Kenney [Brian.Kenney@momentumdynamics.com]; 28:4aa38041-66a2-41a4-ac97-55bc828a9803; 28:512b84d2-5840-45d6-8d01-5f073836d039; Omar Jackson [omar.jackson@momentumdynamics.com]; Seth Wolgemuth [seth.wolgemuth@momentumdynamics.com]; Rob Rosenberger [rob.rosenberger@momentumdynamics.com]

Slot U?

Should be a pallet between Julian's old desk and the ladder rack, likely labeled "U" - shelves are labeled Ax through Yx



Exhibit 6- 02-23-2022 Present Sense Impression

PM 12-04-20 INDUCTEV INITDISCL008441

Message

---

**From:** Joren Wendschuh [joren.wendschuh@momentumdynamics.com]  
**Sent:** 2/23/2022 12:04:20 PM  
**To:** Assata Acey [Assata.Acey@momentumdynamics.com]

Which shelving?

Exhibit 7- 02-23-2022 Present Sense Impression

PM 12-04-44 INDUCTEV INITDISCL005851

Message

---

**From:** Joren Wendschuh [joren.wendschuh@momentumdynamics.com]  
**Sent:** 2/23/2022 12:04:44 PM  
**To:** Assata Acey [Assata.Acey@momentumdynamics.com]

(Color)

Exhibit 8- 02-23-2022 Present Sense Impression

PM 12-04-48 INDUCTEV INITDISCL004145

Message

---

**From:** Assata Acey [Assata.Acey@momentumdynamics.com]  
**Sent:** 2/23/2022 12:04:48 PM  
**To:** Joren Wendschuh [joren.wendschuh@momentumdynamics.com]

black

Exhibit 9- 02-23-2022 Present Sense Impression

PM 12-05-00 INDUCTEV INITDISCL001834

Message

---

**From:** Joren Wendschuh [joren.wendschuh@momentumdynamics.com]  
**Sent:** 2/23/2022 12:05:00 PM  
**To:** Assata Acey [Assata.Acey@momentumdynamics.com]

on back wall, or next to Ron Lab



Exhibit 10- 02-23-2022 Present Sense

Impression PM 12-05-10 INDUCTEV

INITDISCL011767

Message

---

**From:** Assata Acey [Assata.Acey@momentumdynamics.com]  
**Sent:** 2/23/2022 12:05:10 PM  
**To:** Joren Wendschuh [joren.wendschuh@momentumdynamics.com]

also she came to me apparently seconds after chatting dan so idk abt the weekend comment but whatever

Exhibit 11- 02-23-2022 Present Sense

Impression PM 12-05-34 INDUCTEV

INITDISCL006831

Message

---

**From:** Assata Acey [Assata.Acey@momentumdynamics.com]  
**Sent:** 2/23/2022 12:05:34 PM  
**To:** Joren Wendschuh [joren.wendschuh@momentumdynamics.com]

"it doesn't appear as if they using it"

Exhibit 12- 02-23-2022 Present Sense

Impression PM 12-05-39 INDUCTEV

INITDISCL001659

Message

---

**From:** Assata Acey [Assata.Acey@momentumdynamics.com]  
**Sent:** 2/23/2022 12:05:39 PM  
**To:** Joren Wendschuh [joren.wendschuh@momentumdynamics.com]

alot

Exhibit 13- 02-23-2022 Present Sense

Impression PM 12-06-15 INDUCTEV

INITDISCL002324

Message

---

**From:** Joren Wendschuh [joren.wendschuh@momentumdynamics.com]  
**Sent:** 2/23/2022 12:06:15 PM  
**To:** Assata Acey [Assata.Acey@momentumdynamics.com]

haha. Well.

I can accept giving the shelving itself up, but not the space itself.  
Certainly can share the shelving, as it comes apart.



Exhibit 14- 02-23-2022 Present Sense

Impression PM 12-06-24 INDUCTEV

INITDISCL004208

Message

---

**From:** Joren Wendschuh [joren.wendschuh@momentumdynamics.com]  
**Sent:** 2/23/2022 12:06:24 PM  
**To:** Assata Acey [Assata.Acey@momentumdynamics.com]

**Assata Acey**

also she came to me apparently seconds after chatting dan so idk abt the weekend comment but whatever ew.

Exhibit 15- 02-23-2022 Present Sense

Impression PM 12-07-56 INDUCTEV

INITDISCL002210

Message

---

**From:** Assata Acey [Assata.Acey@momentumdynamics.com]  
**Sent:** 2/23/2022 12:07:56 PM  
**To:** Joren Wendschuh [joren.wendschuh@momentumdynamics.com]

hes "her new favorite person now" and apparently the new plug for lab glasses

Exhibit 16- 02-23-2022 Present Sense

Impression PM 12-08-09 INDUCTEV

INITDISCL002163

Message

---

**From:** Assata Acey [Assata.Acey@momentumdynamics.com]  
**Sent:** 2/23/2022 12:08:09 PM  
**To:** Joren Wendschuh [joren.wendschuh@momentumdynamics.com]

meh.. as long as she doesnt revisit the gyno offer, im good

Exhibit 17- 2022- Talis Announces Company  
Wide Diversity Training for September While I  
am Still Employed



## Mandatory Training for All Employees



**Judy Talis**

Alex Kmetz, Alexa Heisler, + 80

10:14 AM



Team,

As we move into the last part of 2022 and look ahead to next year, we continue to look for ways to build the company into an even stronger organization and workplace. Part of that work involves sharing our continued commitment to respect, inclusion and diversity for all personnel, and learning how to interrupt behaviors and practices that interfere with that pledge.

To that end, we are continuing our interactive training session and discussion for all employees on Diversity and Inclusion: Creating a Workplace Culture of Belonging, which will focus on our individual and collective responsibilities to build a diverse, fair, and respectful environment. These live sessions will be conducted through virtual platforms and led by the company's trusted and highly qualified external trainer, Janeen Olsen Dougherty, together with me. All employees will be required participate in



Reply to all



Exhibit 18- 2022- Talis Announces Company  
Wide Diversity Training for September  
While I am Still Employed



To that end, we are continuing our interactive training session and discussion for all employees on Diversity and Inclusion: Creating a Workplace Culture of Belonging, which will focus on our individual and collective responsibilities to build a diverse, fair, and respectful environment. These live sessions will be conducted through virtual platforms and led by the company's trusted and highly qualified external trainer, Janeen Olsen Dougherty, together with me. All employees will be required participate in these sessions and our leaders will also participate in an additional program focusing on their added responsibilities.

Each of you will receive information about the timing and logistics of your session and all employees will be required to attend their designated session in order to allow the company to complete this critical priority before year-end. We recognize the many competing priorities and time pressures that we all face, and you may need to move other meetings to accommodate these sessions. We thank you in advance for your continued shared stewardship of our workplace and the individual employees and perspectives that contribute to its success.

**You will receive a Teams Meeting Invite. If you cannot attend on your designated time slot and were unable**



Reply to all



Exhibit 19- 2022 Talis Announces Company  
Wide Diversity Training for September  
While I am Still Employed



**attend on your designated time slot and were unable to move around your schedule, please reach out to me directly or Diana and we will assign you to another session. Please note that non-supervisor roles will be dismissed from training after 2 hours while supervisor roles will continue for the last hour of the session. Dates and times below:**

Tuesday, September 13<sup>th</sup> : Employees from 1 PM to 3PM / Supervisors until 4PM

Thursday, September 15<sup>th</sup>: Employees from 9 AM to 11 AM/ Supervisors until 12PM

Wednesday, September 21<sup>st</sup> : Employees from 9 AM to 11 AM / Supervisors until 12 PM

Wednesday, September 28<sup>th</sup> : Employees from 1 PM to 3 PM/ Supervisors until 4PM

**Judy Talis | Chief Administrative Officer**

**O: 484-320-8222 ext 128**

**M: 610-613-1449**

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Exhibit 20- 2022 Wilmes Announces New Dates  
for Diversity Training While I am Still  
Employed



## Mandatory Training - Diversity and Inclusion: Creating a Workplace Culture of Belonging



**Diana Wilmes**

4:12 PM

Bob Kacergis, Assata Acey, + 16



Team,

We are going to be merging this training with one of the other three dates. If you have a specific date/time that works best, feel free to send that over to me. The dates/times to choose from are:

Tuesday, September 13<sup>th</sup> : Employees from 1 PM to 3PM / Supervisors until 4PM

Thursday, September 15<sup>th</sup>: Employees from 9 AM to 11 AM/ Supervisors until 12PM

Wednesday, September 21<sup>st</sup> : Employees from 9 AM to 11 AM / Supervisors until 12 PM

Thanks,

Diana

**Diana Wilmes SHRM-CP | Operations**

**O: 484-320-8222 ext 130**

**M: 484-375-9864**



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Exhibit 21- 2022- Wilmes Announces Training as  
rescheduled to November While I  
am Still Employed



## Diversity and Inclusion Training to be postponed



**Diana Wilmes**  
MD Employees

2:33 PM



Team,

Due to our current workload demand, we have made the decision to postpone the Diversity & Inclusion trainings that were scheduled for this month. The training will be rescheduled for November. Please be on the lookout for a new invitation shortly.

Thank you.

**Diana Wilmes SHRM-CP | Operations and HR Generalist**

**O: 484-320-8222 ext 130**

**M: 484-375-9864**

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Reply to all





ECF 15-49- 02/16/2022 HR meeting [with  
supervisor regarding complaints] Confirmed

< Joren(boss)  
12:44 PM, Feb 16

Also had a conversation with Judy. She explained about the Tom issue on January 25th at 3pm. I'm sorry, I didn't consciously process it, as I have no recollection on it at all. Other instances yes, but not that one. Also discussed some re future promotions for you and career path. The conversation from last week did not get talked about. That's still between us and we should work out where we are with that a bit more this week, maybe just a brief written email rewriting job description and responsibilities so that we're both in agreement.



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Excerpt- Part II 20 of Doc 40

**11:53:35 AM Joren:** bKM?

**11:54:54 AM Joren:** [Direct response to message from 11:48:11 AM] Fair for 2nd question, mostly. What about "How does this benefit the company?" "How does this grow the company?" (How does this benefit the shareholders? and grow the valuation of the company)

**12:43:52 PM Assata:** [Direct response to message from 11:53:35 AM] Typo

**12:46:22 PM Assata:** I mean she could use the same argument as the diversity training. But it's also shown that supporting and encouraging differences in company can serve to attract, retain and improve the effective/collaborative use of diverse talent

**12:47:51 PM Joren:** Think the diversity training is not just a legal liability token activity? (really, just curious what you think)

**12:49:04 PM Assata:** I mean yeah, but they also sell it be it looks good.

HR exists to keep company from being sued.

But they also have a hand or interest in talent retention and attracting more ppl of different backgrounds to achieve more., or they should

**12:49:40 PM Assata:** Also Dan and I made kettle and traditional popcorn from scratch and it was fun!!

**12:54:11 PM Joren:** Don't get me wrong. I support your thoughts and idea here, I think having answers to these questions in your initial communications to HR would go a long way.

Keep it short - at most 1/3 page if printed, (not including list).

Possibly include attachment with movie titles and 2-3 sentence summary of movie (and if available on netflix, Hulu, etc., where people can find it - since things like "Blockbuster" aren't a thing any more. \*box of shrunken text\*)

I'm not dismissing the idea, or saying don't do it. Just give it the best shot of success.

Interesting. I made popcorn last night using a hot air popper (best way ever). Second best way is in a pan / kettle :) Awesome!

Microwave or bagged popcorn doesn't even hold a candle to either of the above.

20. **01/25/2022 Present sense impression and excited utterance from myself to my supervisor about Tom Hornberger (senior R&D technician through July 2022, aka "mustacio guy/mustache man") passionately calling Julian Jackson (black warehouse associate) lazy (Ex. 253-256). Supporting exhibits (Ex. 226-237). References: ECF 8-1 (¶¶39-40, ¶¶120, ¶¶123(b)), Doc. 15 (¶¶77).**

**3:49:22 PM Joren:** Assembly VA Connector subassembly P-002092-Tool VA HV Connector assembly fixture - do you have a photo of this?

**3:49:32 PM Joren:** Either way, go save BACON

**3:49:37 PM Assata:** not folks at work getting mad about the garage door and calling Julian lazy behind it. like hes the only one using the door/leaving it open and all uses are just to bring forklift in vs in and out of waiting for vendors to unload... yikes. of course it was mustache man.

**3:49:43 PM Assata:** goign to save bacon!

21. **01/28/2022 Present sense impression and excited utterance from myself to my supervisor about a white (Brian Kenny) who used me to access the building, held the door open for a white woman, and then allowed the door to slam in my face, leaving me to carry the team's refreshments on my own (Ex. 257-283). References: ECF 8-1(¶¶39-40(c), 96, 110-111), Doc 15(¶¶77-78).**

**8:16:24 AM Assata:** Brian was parked at same time but went upstairs. Dan is at his desk

**8:16:56 AM Joren:** haha. Smart guy - he's going for the donuts.

Excerpt- Part II 30 of Doc 40

12:24:21 PM Assata: \*unproduced attachment\*

12:24:37 PM Joren: Awww That's so cute!!!

12:24:59 PM Joren: Oh yay!

12:25:10 PM Joren: Take some time and rest though, please

28. 02/11/2022 Present sense impression, excited utterance and adverse party statements between my supervisor and Diana Wilmes regarding white technician Steve Brown's interest in my attendance and the possibility of negative rumors being spread about me (Ex. 790-791).

Supporting exhibits: Ex. 844-849. References: ECF-8-1 (¶110-111, ¶121(b), ¶123), Doc 15 (¶77-78).

8:40:58 AM Diana Wilmes: Hey Joren, I heard Steve Brown asking Rob if they had seen Assata lately. Sounded like Rob hadn't seen her in a while. And come to think of it, I haven't seen her lately either. Is she working downstairs or from home? Not sure why he was asking but if someone comes and asks me, I just want to know something to say. Hopefully she is not sick.

9:01:43 AM Joren: Diana, Yeah, I'm frustrated with the rumor mill here at work. [\*unproduced image\*] A lot of people saying bad things about people.

Assata has been doing some research and writing up procedures, because of this. I'm letting her work from home to do them, as there's little reason to be in the office to just be on the computer.

Thanks for reaching out. Hope that helps?

29. 02/11/2022 Adverse Party Statement from CAO to me requesting a follow up on our meeting about my racial experiences at work (Ex. 308). References: ECF 8-1(¶42-43), Doc 15 (¶77-78).

9:38:52 AM Judy: do you have a sec for a quick teams call. Had a quick question

30. 02/15/2022 Adverse party statements between CAO and my supervisor about meeting to discuss the racial experiences I shared in my meeting with CAO (Ex. 317-318). References: ECF 8-1 (¶40(b), ¶42, ¶96-103), Doc 15 (¶77-78), ECF 15-49.

8:06:01 PM Judy: Sure I will be in tomorrow. I also want to speak to you about Assata and some things she shared with me. My calendar is up to date but regardless I will find time for you

8:11:00 PM Joren: Thank you. I'll see about booking a room if that's all right.

Re:Assata, okay, I appreciate it.

31. 02/15/2022 Excited utterance from myself to my supervisor about CAO's prior response to my shared racial experiences and his adverse party statement and present sense impression about CAO's interest in following up with him about these things (in addition to project management duties for a team deliverable) (Ex.319-336). References: ECF 8-1 (¶42, ¶96-103, ¶134-163), Doc 15 (¶77-78), ECF 15-62-15-63, Doc 20 (¶8-49), ECF 20-5 to 20-16, ECF 20-21.

8:14:56 PM Joren: Please do a review of all fixtures and tooling needs for a lie / cc va outside of the BoM, and provide a list. Looking for what fixturing we need to have more of if we're looking to run more builds in parallel. Is that something you'd be okay putting together a draft for by mid day Thursday?

Also, Judy wants to talk to me about some things regarding Assata. Please let me know anything you think I need to before going into a meeting with her tomorrow.

8:19:30 PM Assata: I can't im

agine what: either she wants to ask you what doctor I'm using, whether the nausea subsided, complain about me discussing racism at work with you vs her, ask if I'm starting trouble, asking for tips be I explained you have 50% of company's black women and 33% of companies black population where several groups go without women at all, maybe she wa to to know why I don't